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IN REPLY REFER TO.

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From: Commanding Officer, Naval Amphibious Base Little Creek
To: Commander, Atlantic Division, Naval Facilities Engineering
Command (Code 1822)

Subj: COMMENTS ON THE DRAFT FINAL SUPPLEMENTAL ECOLOGICAL
ASSESSMENT

Encl: (1) Detailed Comments List

1. Enclosure (1) is forwarded for inclusion in the final
comments list on the Draft Final Supplemental Ecological
Assessment prepared by Baker Environmental, Inc.


R. D. ROTZ
By ~~direction~~

NAB LITTLE CREEK

COMMENTS ON THE

DRAFT FINAL SUPPLEMENTAL ECOLOGICAL ASSESSMENT

Table of Contents page iii - Change the heading for Appendix D to "IR-Related Surface Water and Sediment Data for Sites 7 and 12" Change the title on the starting page of the Appendix itself.

List of Acronyms and Abbreviations - Include "STORET The USEPA computer system for the storage and retrieval of water quality data".

Executive Summary -

In General - The Executive Summary and the Document itself should be able to stand alone. Therefore, any abbreviations used in the ES should be fully explained. The first occurrence of the same abbreviations should still be explained in the document. This is so that the public can read either the ES or the document, not both.

Section 1.0 page 1 - Change the last sentence of the first paragraph to: "... the impact of NAB Little Creek IR sites on the ecological ...".

Section 2.0 page 1 - Change the first sentence to: "... water quality studies, NAB Little Creek Natural Resources Program Management reports, NAB Little ...".

Section 3.0 page 2 - Change the third sentence of the first paragraph to: "The IR data from the RI/FS report was ...". In the second sentence of the second paragraph change "... STORET ..." to "... STORET (USEPA's computer system for storage and retrieval of water quality data) ...".

Section 3.1 page 3 - Change the first sentence of the third paragraph to: "... ECOCs may potentially adversely impact the aquatic ...". In the fourth sentence change "... the AQUIRE database." to "... the Aquatic Information Retrieval Database (AQUIRE)."

Section 3.1 page 4 - In the last sentence in the very first paragraph change "ER-L" to "Effects Range-Low (ER-L)".

Section 3.2 page 4 - In the last sentence of the first paragraph change "that" to "than".

Section 3.2 page 5 - Change the first sentence of the second paragraph to: "... water and sediment at Site 12 may ...". In the last sentence of the third paragraph change "ER-M" to "Effects Range-Median (ER-M)".

Section 4.0 page 6 - Change the first sentence to: "... presenting a risk to the aquatic receptors in Little ...". In the third sentence, delete the word "the" after "1)".

Section 4.2 page 7 - In the first sentence of the third paragraph change "non-RI" to "non-IR". Also in the first sentence, shouldn't nickel be added to the list of metals? In the third sentence change "IR" to "RI".

Section 4.2 page 8 - In the very first sentence at the top that continues from the previous page, change the spelling of the lake

to "Chubb". This spelling change needs to be made throughout the entire document. Change the last sentence to: "These non-IR related potential sources ...".

Section 5.0 page 9 - Change the third bullet to: "... 7 and 12 during the RI indicated that several inorganic compounds may potentially adversely impact the overall ...". Change the second sentence of the fifth bullet to: "However, mercury was detected in only one station ...". For this bullet, see comments for Section 6.0. Any changes made to the corresponding bullet in that section should be made in the Executive Summary.

Section 1.2.2 page 1-4 - This paragraph implies that surface runoff from Sites 13 and 11 flow to Little Creek and Desert Cove. The paragraph also states that groundwater flows to these coves. Clarify that these sites are greatly removed from the coves, there is no direct runoff or groundwater flow from the sites and therefore any influence the sites has on the coves is imperceptible.

Section 2.2.1 page 2-6 - In the second sentence of the paragraph above Water, Sediment and ... change the word "specie" to "species".

Section 2.2.1 page 2-7 - In the first sentence of the first full paragraph, change the roman numeral "II" to "2".

Section 2.2.1 page 2-8 - The first sentence of the last paragraph states that data from the Ponar sampler were used in this study. Why the Ponar and not one of the other four? Why is it better/more accurate than the other four?

Section 2.2.1 page 2-9 - In the first sentence of the fourth paragraph on the page, change "CAX." to "Cheatham Annex (CAX)."

Section 2.2.1 page 2-10 - The first sentence under Dredging Data is not a complete sentence. Please clarify.

Section 2.2.1 page 2-11 - The second to last sentence of the third paragraph on the page is a run-on. Please clarify.

Section 2.2.1 page 2-12 - In the second sentence of the third paragraph change "Cheatham Annex (CAX)" to "CAX".

Section 2.2.2 page 2-16 - Delete "including" from inside the second set of parentheses in the first sentence of the second paragraph. Change "contaminant" in the first sentence of the third paragraph to "contamination"

Section 2.2.2 page 2-17 - Change the first sentence of the second paragraph to: "... samples were collected at Site 12." In the third sentence of the last paragraph change "volatile organic compounds" to "VOCs".

Section 4.0 page 4-1 - Change the last sentence to: "... the

focused ecological risk assessment (ERA) conducted ...".

Section 4.1 page 4-1 - Change the first sentence to: "... the potential that past IR site operations at ...".

Section 4.2 page 4-2 - In the second sentence change "ECOCs." to "Ecological Contaminants of Concern (ECOCs)."

Section 4.2.2 page 4-3 - Change the last sentence to: "... between the two sites and the proposed ...".

Section 4.2.2.1 page 4-5 - The second and third sentences of the third paragraph state that chemicals detected below the screening levels were not kept as ECOCs but some detection limits are above the screening levels. Please clarify whether these chemicals with detection limits above the screening levels were retained as ECOCs or not.

Section 4.2.2.2 page 4-6 - Changes "Sites" to "Site" in the first sentence of the fourth paragraph.

Section 4.2.2.2 page 4-7 - Changes "Sites" to "Site" in the first sentence of the first paragraph.

Section 4.2.2.4 page 4-8 - Delete the comma after pH in the last sentence of the second paragraph. Change "fraction" to "portion" in the first sentence of the third paragraph. The explanation "... resulting in increased particle size that will remove adsorbed and incorporated metals to the sediment" is very confusing. Are the metals desorbed and released to the water or adsorbed more readily by the sediment? Could the preceding explanation be replaced with "... resulting in increased particle size that will remove metals from the water column by adsorption to the sediment"? If not, please clarify this explanation. Also in the next part of that sentence, could the phrase "mobilization from carrier particles" be replaced with "dissociation"? If not, please clarify that phrase. The last part of the sentence states "resulting in increased availability to the biota". Does this statement refer to both (1) and (2) or just (2)? Please modify the sentence and/or the structure to clarify this point. Begin a new paragraph with the next sentence. Replace "displace" in the third sentence of the last paragraph with "carry". The fourth sentence states "... diagenetic remobilization (the conversion, by compaction or chemical reaction, of sediment into rock) ..." is the definition for "diagenetic". To include "remobilization" in the definition, change the parentheses to: "the release of contaminants back to the water column during the conversion of the sediment into rock".

Section 4.2.2.5 page 4-9 - There may be a space missing between "DOconcentrations" at the end of the last sentence of the first paragraph.

Section 4.2.2.5 page 4-10 - Add a paragraph at the end of this section stating the wetlands downstream of Site 12 are a potential sink for the metals in surface water due to the mechanisms discussed above (in the section).

Section 4.2.3.1 page 4-11 - Change the second sentence of the second paragraph to: "The heavy use of the channel within the Little Creek area disturbs the bottom muds and associated organisms."

Section 4.2.3.2 page 4-12 - Delete the "s" from "animals" in the first sentence of the third paragraph.

Section 4.2.5 page 4-16 - Clarify in the second sentence of the first paragraph that groundwater and surface water/sediment are **exposure** pathways. Make it clear that the groundwater exposure pathway is not complete because there is no exposure point for aquatic receptors.

Section 4.4.1 page 4-18 - Delete the comma after "In addition" in the fourth sentence of the first paragraph.

Section 4.5.1 page 4-20 - Change the very last sentence on the page to: "A QI ratio greater than one ...".

Section 4.5.2.1 page 4-22 - There should be a space between lines 6 and 7 to separate the paragraphs.

Section 4.6.1.1 page 4-24 - Change the first sentence of the third paragraph to: "... ECOCs may potentially adversely impact the aquatic ...".

Section 4.6.1.2 page 4-26 - In the first full paragraph on the page, change three occurrences of "drainage ditch" to "drainage canal". Change "process" to "processes" at the end of the second to last sentence in the second paragraph. At the end of the last paragraph insert "(see discussions in sections 4.2.2.4 and 4.2.2.5)."

Section 4.7.5 page 4-30 - At the end of the section, add a sentence stating that the way the average QI was calculated was very conservative.

Section 5.1 page 5-2 - At the end of the last sentence of the section, change "... at Site 7." to "... than Site 7."

Section 5.2 page 5-3 - In the first and second paragraphs change five occurrences of "drainage ditch" to "drainage canal".

Section 5.3 page 5-4 - Change "plasticity" to "versatility" in the last sentence of the second full paragraph.

Section 6.0 page 6-1 - The fifth bullet states: "The water quality in Little Creek Harbor based on the water quality study

by Ewing et al. (1992) is meeting ambient water quality criteria ...". State more clearly what "criteria" are met. Also, since the criteria referred to are not in any table, take out the references of the tables.

Section 6.0 page 6-2 - Delete the word "the" after "2)" in the first full bullet.

Figure 3 - At Site 7, there are two locations for LC7-SW3 for the IRI. The location to the east should be changed to LC7-SW4. At Site 12, to the south of the site is a location labeled LC12-SED13. This should be changed to LC12-SED3.

Figure 7 - Under "IR Site 12" change "drainage ditch" to "drainage canal".